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June 17, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TWB-204
Washington, D.C. 20554

Re: Application by Verizon New Jersey Inc. for Authorization to Provide In-Region, InterLATA Services in the State of New Jersey, WC Docket 02-67

Dear Ms. Dortch:

This letter responds to AT&T's June 14, 2002 *ex parte*, in which AT&T alleges that Dr. Dilshad Khawaja, a resident of New Jersey, was contacted on June 12, 2002, by a Verizon telemarketing vendor attempting to sell him Verizon long distance service. See June 14, 2002 Letter from Robert W. Quinn, Jr., AT&T, to Marlene H. Dortch, FCC, CC Docket 02-67, and attached Declaration of Dr. Dilshad Khawaja dated June 14, 2002.

As described below, Verizon has investigated Dr. Khawaja's statement and determined that an individual at his number was contacted by an authorized Verizon telemarketer on June 8 as part of sales campaign for a local service package that does not include long distance. No authorized representative of Verizon appears to have contacted Dr. Khawaja on June 12. We also have confirmed that none of Verizon's authorized telemarketers prematurely initiated a telemarketing campaign for long distance in New Jersey.

Specifically, in response to AT&T's filing, Verizon contacted each of its five telemarketing vendors responsible for the consumer local and long distance markets (excluding wireless and DSL) in New Jersey and asked them to search their computers for the phone number provided by Dr. Khawaja. To make sure that Verizon's investigation was complete, Verizon also searched for calls placed to a second number billed to Dr. Khawaja's address. Breen Decl. ¶6. Only one vendor – King Teleservices – has any record of calls made to Dr. Khawaja in June 2002. None of Verizon's vendors has a record of a call placed to Dr. Khawaja's phone number on June 12, 2002. Breen Decl. ¶7; Circenis Decl. ¶¶4-5.

On June 8, 2002, one of King's representatives made a call to someone at Dr. Khawaja's phone number and offered Verizon's Local Package Premium. The script for this offering does not mention long distance service, nor does it even mention Verizon's IntraLATA toll service. Breen Decl. ¶8; Circenis Decl. ¶5. In fact, the script used by this representative includes the

following large heading: "CANNOT SELL LONG DISTANCE -- NOT VZ APPROVED." Breen Decl. ¶¶8; Circenis Decl. ¶5.

Verizon and King have reviewed the performance evaluations and recent audiotapes of the marketing calls made by the King representative who called Dr. Khawaja's phone number on June 8. The representative consistently has received quality scores of 90 or better (out of 100), and has never received a complaint that she attempted to sell services not available in that state. Breen Decl. ¶¶9-10; Circenis Decl. ¶¶6-7. Importantly, during a call on June 6, 2002, another New Jersey customer asked this representative whether Verizon provided long distance in that state; she told the customer "no." Breen Decl. ¶10; Circenis Decl. ¶7.

As Ms. Breen and Ms. Circenis explain in their Declarations, Verizon and its vendors also have established procedures to ensure that the correct state-specific, campaign-specific scripts are used with a particular customer. Breen Decl. ¶¶13-15; Circenis Decl. ¶¶9-12. Verizon sends both the customer phone list and the corresponding scripts to the vendors, who in turn load this information into their automated dialers and computer systems. These phone numbers and scripts are coded so that the two are always linked in the vendors' systems. Verizon and its vendors also have a series of checks and tests in place to again make sure that scripts and phone numbers are matched correctly, and to make sure that the customer is offered the correct products at the correct prices. Breen Decl. ¶13; Circenis Decl. ¶11. This ensures that, when a customer answers the phone, the marketing representative picks up the call and the appropriate state-specific, campaign-specific script automatically appears on the representative's computer screen. Breen Decl. ¶13; Circenis Decl. ¶10.

In addition, all vendor representatives are trained to understand Verizon's different product offerings, including where such products are being offered, and where they are not. Breen Decl. ¶16; Circenis Decl. ¶¶14-15. Before every campaign is launched, Verizon and its vendors again review with the vendors' representatives the products being offered and the states eligible for the offering. Breen Decl. ¶16; Circenis Decl. ¶13. Verizon and its vendors have stringent quality controls and monitoring processes in place to ensure that the marketing representatives are following the rules. Breen Decl. ¶16; Circenis Decl. ¶¶16-17.

In response to AT&T's filing, Verizon also confirmed that none of its authorized vendors prematurely initiated a long distance telemarketing campaign in New Jersey. Although Verizon has begun to compile lists of potential New Jersey long distance customers, Verizon confirmed that none of its five telemarketing vendors have yet loaded these lists into their automated dialing machines. No customer has therefore been called from any of these long distance lists. *See* Breen Decl. ¶¶17-18.

Ms. Marlene H. Dortch

June 17, 2002

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Finally, Verizon is aware that some telemarketing companies fraudulently tell customers that they represent or are affiliated with Verizon. Where Verizon has discovered these types of activities, Verizon has demanded that these companies cease these activities. Breen Decl. ¶20. We have not determined whether such activities are taking place in New Jersey.

Sincerely,


Michael E. Glover

cc: B. Olson
J. Carlisle
B. Davenport
A. Johns
S. Pie
R. Tibayan Remy

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon New Jersey)	
Inc., Bell Atlantic Communications,)	
Inc. (d/b/a Verizon Long Distance),)	WC Docket No. 02-67
NYNEX Long Distance Company)	
(d/b/a Verizon Enterprise Solutions),)	
Verizon Global Networks Inc., and)	
Verizon Select Services Inc., for)	
Authorization To Provide In-Region,)	
InterLATA Services in New Jersey)	

DECLARATION OF MAURA C. BREEN

1. My name is Maura C. Breen. I am Senior Vice President, Chief Marketing Officer, for Verizon Retail Markets. I have more than 24 years of experience in the telecommunications industry in a variety of operations, marketing and strategy positions at NYNEX, Bell Atlantic, and now Verizon. Prior to my current position, I was President and Chief Executive Officer of Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, a wholly owned subsidiary of Verizon Communications Inc., from 1999-2001. I have also served as Vice President of Operations, Consumer Sales and Service for Bell Atlantic. In that role, I managed the development and execution of competitive marketing plans and customer care strategies. I graduated from Skidmore College, and I have attended executive development programs at Rutgers University and Harvard University.

8. Verizon's and King's investigations further determined that the King marketing representative who made this call to someone at Dr. Khawaja's phone number on June 8th used a script offering Verizon's Local Premium Package. (See Attachment 1). This package includes: the customer's dial tone charge, local calls, unlimited local directory assistance, and a choice of four or more calling features (such as call waiting and caller ID). This package does *not* include any mention of Verizon's long distance service, or even Verizon's regional toll service. In fact this script contained the following heading: "CANNOT SELL LONG DISTANCE - NOT VZ APPROVED." The person with whom the representative spoke indicated that he/she was not interested in the offer; as Ms. Circenis explains, Dr. Khawaja's phone number was therefore put on a list indicating that his number was not to be called again for this particular campaign.

9. Verizon and King also investigated the history and experience of the representative who contacted Dr. Khawaja's phone number on June 8th. As Ms. Circenis explains in her Declaration, this representative is well trained and one of King's top representatives. She consistently receives high marks for quality and has never received a complaint from a customer.

10. King also reviewed several audiotapes of the representative's recent calls with customers. These tapes are a result of periodic monitoring by King for quality control purposes. During one of these calls, on June 6, 2002, a customer in New Jersey asked the representative whether Verizon sells long distance service in that state; she responded that Verizon did not. Ms. Circenis provides additional details of this call in her Declaration. Thus, the representative understands that it would not be appropriate to

offer Verizon long distance service to customers in New Jersey. There is no audiotape available for any of the calls made to Dr. Khawaja's phone number.

Overview of Verizon's Telemarketing Practices

11. Verizon provides each of its five New Jersey vendors with electronic lists of the customers to be called (known as "leads"), which are compiled based on specific marketing campaigns. These lists are electronically uploaded into the vendors' automated dialers, which are programmed to automatically dial one number after another.

12. Verizon also provides its telemarketing vendors with the specific scripts to be used when calling each lead. These scripts are reviewed and approved by Verizon's legal department.

13. Verizon's telemarketing vendors are expected to adhere to the details of the particular marketing campaign provided by Verizon. Verizon and its vendors have established a set of checks and edits to ensure that the vendor's representatives do not offer the wrong products to a customer. First, each script is loaded into the vendor's computers and is coded to correspond to each of the leads provided by Verizon. Second, the vendors then check the customer's name and phone number again to make sure they have loaded the correct state-specific and campaign-specific script for that customer into the computer. Ms. Circenis explains in her Declaration how this is done. These steps ensure that, when a customer answers the phone, the appropriate state-specific, campaign-specific script *automatically* appears on the representative's computer screen and the offer is made to the customer.

14. Verizon and its vendors pay careful attention to state-specific issues, including whether a product such as long distance service is actually available in the state

being called. Indeed, vendors have been paying careful attention to differences among Verizon's various states even before Verizon was authorized in any state to provide long distance. Verizon's vendors know, for example, that each state has a different pricing structure for intrastate services and that not all product offerings are available in all states. Thus, Verizon's vendors and their representatives have known for many years that it is critical that the customer being called is offered the correct products at the correct prices.

15. As an additional safeguard, as noted above, all of scripts used by King in non-authorized 271 states have the following large heading at the top: "CANNOT SELL LONG DISTANCE - NOT VZ APPROVED." (*See* Attachment 1). Other vendors have similar notations on the computer screen that the representatives see when talking to a potential customer. Though the vendors' representatives receive specific training regarding the limitations on Verizon's sale or marketing of long distance services in certain states, as Ms. Circenis explains in her accompanying Declaration, this heading serves as an additional reminder to representatives that this prohibition exists.

16. Verizon also trains and monitors its vendors to ensure, among other things, that they are not offering products in a state that is not authorized to sell the product. For example, Verizon conducts on-site training before the launch of every campaign. This training includes a description of the products being offered and the states eligible for these product offerings. Verizon also listens to several hours of vendor calls to customers per week to ensure quality and that the representative is following Verizon's instructions. Verizon also conducts on-site visits and spot-checks its vendors' dialing systems to ensure that marketing scripts have been properly loaded into the

vendor's computers and reflect the appropriate products and prices. In addition, a third-party vendor monitors a sampling (approximately 1.0%) of calls made by Verizon's vendors. Finally, Verizon is also aware that its vendors have their own quality controls and monitoring processes. Ms. Circenis explains King's quality controls in her Declaration.

17. In addition to investigating the customer contact addressed in AT&T's submission, Verizon also has confirmed that none of its vendors has prematurely begun a long distance telemarketing campaign. In anticipation of receiving long distance approval in New Jersey, Verizon has begun preparing lists of leads to be contacted by Verizon's telemarketing vendors offering to sell Verizon's long distance service. All of Verizon's vendors, however, have confirmed that none of these leads has actually been downloaded into the vendors' automated dialers and thus no customer has been called from these lists (the customer, however, may be on another, non-long distance, list).

18. Verizon constantly keeps its vendors updated on the launch date for its long distance campaign in New Jersey. For example, on June 4, 2002, Verizon informed each of its five vendors that the launch date would be July 5, 2002, assuming the Commission approves Verizon's New Jersey application next week, and that Verizon's outbound telemarketing campaign would begin on or about July 12, 2002.

19. In any event, a marketing representative would not be able to process an order for long distance service in New Jersey because his/her computer screen has no field for this service. Verizon's ordering systems likewise would not permit a vendor's representative to enter an order for long distance service.

Conclusion

20. As shown above, Verizon is unable to confirm the allegations in Dr. Khawaja's Declaration. However, Verizon is aware of several instances in which telemarketers have contacted customers alleging to represent Verizon. When Verizon becomes aware of such misrepresentations, it issues cease and desist letters demanding that the companies stop telling customers that they are affiliated with Verizon.

21. This concludes my Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 17, 2002


Maura C. Breen

ATTACHMENT 1


```

X> *****
T> *****
> *****
> CANNOT SELL LONG DISTANCE - NOT VZ APPROVED
= "*****"

```

OVZLOCAL\519 Question\OFFER_TXT (856) 985 -
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

Ovzlocal\519 Question\OFFER2_TXT (856) 985 - [REDACTED]
TRAINING <> TRAINING <> TRAINING

OVLZLOCAL\519 Question/OFFER (856) 985 -
" " " " " TRAINING <> TRAINING <> TRAINING

Page 2

NJ_SCRIPT_LPP.txt

[illegible]

S-Choice; : 1 :
OVZLOCAL\519 Question\PROD (856) 985 - [REDACTED]
" " " " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

```
> Since you ordered Premium Local Package we will be adding the <  
> following value added services to your account: <  
N> <  
A> Call Waiting * 3-Way Calling <  
R> Call Forwarding * Speed Dial 30 <  
R> Call Return(*69) * Repeat Dialing(*66) <  
A> Call Block * <  
T> <  
I> <  
V> <  
E> <  
> <  
T> <  
E> <  
X> <  
T> <  
> <  
> <  
>
```

... Press <Enter> to continue ...*

OVZLOCAL\519 Question\HVM_TXT (856) 985 - [REDACTED]

" TRAINING <> TRAINING <> TRAINING " " "

```
> Mr./Mrs. [REDACTED], I also have a great way for you never <
> to miss an important message. I can set you up today with Verizon's <
N> Home Voice Mail. It will be easy and convenient to check your messages <
A> anytime from any outside phone... and you will have the ability to <
R> personalize your mailbox. For just $4.50 a month your personal <
R> voice mail will include all the following features: <
A> <
T> . You can have and save up to 30 messages for 30 days <
I> . The choice of recording a personalized greeting or using one provided <
V> by Verizon <
E> . Messages can be up to 2 minutes each <
> . Notification of when you have a message waiting <
T> . The security of accessing your mailbox only with your personal <
E> passcode... wich you select. <
X> . The capability of receiving multiple messages at the same time <
T> (max. 5) <
> . No need for special equipment. The feature is simply added to your <
> existing service <
> <
```

OYZLOCAL\519 ... Press <Enter> to continue ...*
Question\NL_HVM (856) 985 - [REDACTED]
Page 3


```
E> There will be 2 charges for it on your first bill. The first will be <  
X> the pro-rated portion that you will use between 06/28/2002 and your <  
T> next bill date. The second charge will be for one month in advance. <  
> verizon always bills your new monthly services one-month in advance. <  
> On your following bill, you will only see the Premium Local Package <  
> billed once. <  
" " " " " " " " " " " " " " " " " " " " " " " " " " " " " "
```

OVZLOCAL\519 Question\RECAPLP (856) 985 -
 " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

```

> DO NOT READ:
T>
E> TAKE OPTION 1 IF CUSTOMER AGREES WITH SERVICE ADDED
X>
T>
>

```

[illegible]

S-choice; : 1 :
OVZLOCAL\519 Question\RECAPHVM (856) 985 - [REDACTED]
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

[illegible]

OVBZLOCAL\519 Question\RECAPHVM2 (856) 985 - [REDACTED]
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

```

>
> Finally, it is very important that you activate your Home Voice Mail
> Service because no one will be able to leave you a message until you
> activate your service. Please take not of the following information
N>
A> so you won't miss any important calls.

```


OVZLOCAL\519 Question\RECAPHVM3 (856) 985 -

```

> ** DO NOT READ **
T> [REDACTED], last chance to decline/remove HOME VOICE MAIL
E> from order.
X>
T>
>
-----
> 1. Yes, add HVM
> 2. No, do not add HVM
C>
H>
Q>
I>
C>
E>
S>
>
>
>

```

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[illegible]

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon New Jersey)	
Inc., Bell Atlantic Communications,)	WC Docket No. 02-67
Inc. (d/b/a Verizon Long Distance),)	
NYNEX Long Distance Company)	
(d/b/a Verizon Enterprise Solutions),)	
Verizon Global Networks Inc., and)	
Verizon Select Services Inc., for)	
Authorization To Provide In-Region,)	
InterLATA Services in New Jersey)	

DECLARATION OF ZENTA T. CIRCENIS

1. My name is Zenta T. Circenis. I am a Senior Accounts Manager for King TeleServices, LLC ("King"), and have been in my current position since April 2001. I have worked in the telemarketing business for more than eight years, during which time I have worked for other telemarketing firms.

2. As Senior Accounts Manager, I manage client services for the Verizon account and oversee the operation of King's telemarketing services for Verizon. In this role, I supervise King's telemarketing floor supervisors, who in turn directly supervise King's Team Leaders and telemarketing representatives assigned to the Verizon account. In addition, I am familiar with how King enters the telephone numbers to be called and associated scripts, provided by Verizon, into King's automated dialer and computer systems. Finally, I am familiar with how King tests its systems to ensure that the correct state-specific, campaign-specific script is being used with a particular customer.

3. The purpose of this Declaration is to describe what King's research has uncovered regarding calls made by us in June 2002 to the phone number provided by Dr. Dilshad Khawaja in his June 14, 2002 Declaration. I also describe the processes King has in place to ensure that

our telemarketing representatives offer customers only the currently available Verizon service offerings. Finally, I describe the extensive training program we have in place to educate our telemarketing representatives, among other things, on why it is important not to deviate from the product offerings provided by Verizon, and, in particular, the importance of not marketing long distance service to customers in states in which Verizon has not yet received permission to provide this service.

King's Investigation of Calls Made to Dr. Dilshad Khawaja in June 2002

4. I was contacted on June 14, 2002 by Verizon to research whether our company made any calls to Dr. Dilshad Khawaja, phone number 908-371-0074, in June 2002. Our computer system tracks each telemarketing call made by a King representative and generates a call history report for each telephone number called. We determined from our computer records that we did in fact make several calls to Dr. Khawaja in June. Attachment 1 is the call history report generated by King's computer system for Dr. Khawaja. Our automated dialer records show that on June 5, we called the above-cited number four times and we were either unsuccessful or told to call back. These calls lasted 19 seconds, 0 seconds, 0 seconds and 73 seconds, respectively. Further, our automated dialer records for June 6 show that we called this same number three times and on each occasion the representative was told to call back. These calls lasted 56 seconds, 50 seconds and 21 seconds, respectively. On June 8, 2002, we placed a call that was not completed successfully.

5. King made a subsequent call to Dr. Khawaja's phone number on June 8, 2002, which lasted one minute, seven seconds. During this call, King's representative would have only offered the customer Verizon's Local Premium Package. (See Attachment 2). The marketing script for this service does not mention Verizon's long distance service or even its intraLATA (or

“regional”) toll service. In addition, the script for this service contains a large statement on the screen which reads: “CANNOT SELL LONG DISTANCE -- NOT VZ APPROVED.” (*See* Attachment 2). The King representative was told by the person on the call that he/she was not interested in our offer based on the call’s disposition. Dr. Khawaja’s account accordingly was marked as a “Final Disposition” in our system, indicating that he was not to be called back regarding this particular campaign. (*See* Attachment 1). Our automated dialer contains no record of calling Dr. Khawaja’s phone number (as listed in paragraph 4) on June 12, 2002, nor would we have had any reason to call him on that date or any subsequent date given that his account received a “Final Disposition” on June 8th. We also were asked to determine whether we had called a second number billed to Dr. Khawaja’s address, provided to us by Verizon. Our investigation indicated that we did not call this second number.

6. The King representative who called Dr. Khawaja’s phone number on June 8th is experienced and has successfully completed King’s training program for new-hire employees, described below, which includes training that specifically addresses the services offered by Verizon on a state-by-state basis. Moreover, through our monitoring and quality control processes, which are discussed below, we have determined that the representative who contacted Dr. Khawaja consistently receives quality scores of 90 or better (out of a maximum score of 100). She has never been subject to any complaints or disciplinary actions by her immediate supervisor.

7. We also listened to audiotapes of several recent calls made by the representative to customers. (No audiotapes are available for any of the calls placed to Dr. Khawaja’s phone number since tapes are made only on calls resulting in sales, or randomly during the quality assurance monitoring process.) During one call, on June 6, 2002, the representative was asked

by a New Jersey customer whether Verizon sells long distance service in that state. She told them “no.” The following is a verbatim transcript of the relevant portions of this conversation:

* * *

Customer: Can I ask you something?
Representative: Go ahead.
Customer: Um, do you have a plan, um, where, um, let me try to explain it, you pay a certain amount every month, not for local calls but for long distance, um?
Representative: No.
Customer: Oh, okay.
Representative: No.
Customer: You don't have that?
Representative: Mm, Mm, We don't even have long distance yet to offer you.
Customer: Oh, okay, alright.
Representative: We're going to try, do you mean long distance or local long distance.
Customer: No, my daughter calls to Florida.
Representative: No.
Customer: I was going to call AT&T cause I know they have it but Verizon doesn't even have long distance, yet.
Representative: Nope, not yet.
Customer: Do you know if they're going to get it any time soon?
Representative: They haven't told me anything, but you know, I'm hoping to.
Customer: Oh, okay. Right now that's the only phone I'd be interested in, but I thank you.

* * *

Overview of King's Telemarketing Processes

8. King has over 11 years of experience providing telemarketing services and has been providing service to Verizon/Bell Atlantic for four years. Although King performs telemarketing operations for a number of other companies, including telephone carriers and financial institutions, the King representatives dedicated to the Verizon account market only Verizon products. King markets local phone services for Verizon in the following states: Maryland, Massachusetts, Maine, New Hampshire, New Jersey, New York, Pennsylvania,

Rhode Island, Vermont, Virginia and the District of Columbia. However, King markets long distance services for Verizon only in Massachusetts, New York, Pennsylvania, Rhode Island and Vermont. Currently, King has over 120 representatives who make calls to customers on Verizon's behalf.

9. Our representatives work from a prepared script supplied by Verizon, which reflects the state-specific service offering targeted to the particular customer being called. Verizon also provides King with a computer listing of the actual telephone numbers to be called for each state-specific marketing campaign. King representatives do not have access to — and do not call — any numbers not on the lists provided by Verizon. King programming personnel then load the appropriate script and call lists into King's automated dialer.

10. We call the customers on Verizon's lists using this automated dialer, which is pre-programmed with the appropriate phone numbers and the associated script. When a customer answers, one of our representatives picks up the call and his/her computer will pull up the appropriate script. This is all done automatically. For example, because Verizon cannot offer long distance service in New Jersey, the marketing script that accompanies New Jersey phone numbers is pre-programmed only with Verizon's local service offering, which does not mention long distance service. In fact, as I noted previously, these scripts specifically contain a statement on the screen that Verizon is *not* authorized to provide long distance service in New Jersey.

11. King performs numerous checks to ensure that its representatives call only the telephone numbers provided by Verizon, and that the correct script is associated with each phone number. Upon receiving the electronic list of numbers to be called for any given marketing campaign, King's programming staff downloads the list, and then prepares it for loading into King's dialing system. Our programming staff then loads the applicable state-specific, campaign

specific scripts into the system. The system then creates specific computer codes associated with the numbers on the call list that vary by state and “synchs up” the numbers with the appropriate marketing script and available service offerings. Before any live calls are made, the programming staff performs several test runs of the system by selecting a specific telephone number and checking to ensure that the script for the correct state appears. We then conduct further tests of the system by performing simulated marketing calls using the automated dialer. We begin making live calls only after these tests are completed.

12. We also have specific software mechanisms in place to ensure that no representative can submit an order for a service that is not available in a specific state or market. For example, in markets in which Verizon is unable to offer long distance services, including New Jersey, our computer system is designed to physically prevent a telemarketing representative from entering an order for long distance.

King’s Training and Quality Assurance Programs

13. Given King’s years of experience marketing Verizon’s phone service, our representatives are well trained on Verizon’s products, including the differences among local, intraLATA toll (which may be referred to as “regional toll,” “local toll” or “local long distance”), and long distance service. Indeed, our new-hire employee training program includes extensive training on the various Verizon services. This training program consists of a one-week course, during which employees spend on average 7.5 hours per day learning, among other things, about Verizon’s services and the prepared scripts. We also conduct additional training on a state-by-state basis every time Verizon launches a campaign. In addition to this training, each representative is provided informational material for his/her work space explaining the various

Verizon marketing campaigns to avoid confusing Verizon services and reinforce our high performance standards.

14. Our representatives are taught that it is critical that they offer only those Verizon products that are available in a specific state, as set forth in Verizon's state-specific marketing scripts. Indeed, our representatives understand that they will be terminated if they attempt to market Verizon services that are not available in any given market. In the entire time King has marketed Verizon services, I am unaware of ever having received a complaint that our representatives were selling services to customers that were not authorized in that state.

15. In particular, our representatives are repeatedly instructed that Verizon is not authorized to provide long distance in all states, including in New Jersey. Moreover, as noted above, all of the King scripts for non-authorized states have the following statement on the screen: "CANNOT SELL LONG DISTANCE -- NOT VZ APPROVED." And if a customer asks if Verizon provides long distance service in one of the non-authorized states, which happens occasionally, our representatives are instructed to tell the customer "no."

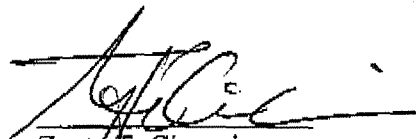
16. We also have in place a number of processes to monitor our representatives to ensure that they are marketing only those services that are available in a specific state. First, our Verizon Team Leaders are constantly present on the calling floor to observe our representatives. Often, these Team Leaders wear headsets that permit them to listen in on marketing calls as they occur. These Team Leaders can also view the representative's screen to see if the representative is offering the correct services at the correct prices to the customer. Second, we prepare evaluation sheets (known as "scan" sheets) on a continuing basis for each representative on the floor, which allow us to identify and catalog mistakes made by the representative. Third, calls to customers are randomly audio-taped and reviewed by our quality assurance group.

17. If we detect *any* potential issues with a representative's performance, we take immediate remedial action. As our executives, supervisors, and representatives are well aware, certain deviations from approved practices —*including offering services that are not available in a specific state* — are cause for immediate termination. (Other reasons for immediate termination include slamming, use of inappropriate language, providing misleading information or quoting incorrect rates.)

18. This concludes my Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 17 2002



Zenta T. Circenis

ATTACHMENT 1

Untitled

LIST DIAL_LOG ALL 10:07:11 Jun 17 2002 1

DIAL_LOG.. Dials Date..... Time. Tsr..... Dur... Disp IB Call ID Queue.....

90837	9	06-08-2002	12:40	[REDACTED]	67	6	NS\$NJ_II
	0	06-08-2002	12:07	[REDACTED]	0	101	CB\$NJ_II
		06-06-2002	20:51	[REDACTED]	21	13	CB\$NJ_II
		06-06-2002	19:44	[REDACTED]	50	13	CB\$NJ_II
		06-06-2002	17:08	[REDACTED]	56	13	CB\$NJ_II
		06-05-2002	19:30	[REDACTED]	73	13	NS\$NJ_II
		06-05-2002	19:04	[REDACTED]	0	101	NS\$NJ_II
		06-05-2002	18:35	[REDACTED]	0	101	CB\$NJ_II
		06-05-2002	10:20	[REDACTED]	19	13	FRESH\$NJ_I

I

1 record listed

13 = Callback
101 = Unsuccessful Attempt
6 = Not Interested

ATTACHMENT 2

[illegible]

[illegible]

OVZLOCAL\519 Question\OFFER_TXT (856) 985 - [REDACTED]
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

[illegible]

OVZLOCAL\519 Question\OFFER (856) 985 -
" " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

Page 2

[illegible][illegible]

```
> Mr./Mrs. [REDACTED], I also have a great way for you never <
> to miss an important message. I can set you up today with Verizon's <
N> Home Voice Mail. It will be easy and convenient to check your messages <
A> anytime from any outside phone... and you will have the ability to <
R> personalize your mailbox. For just $4.50 a month your personal <
R> voice mail will include all the following features: <
A> <
T> . You can have and save up to 30 messages for 30 days <
I> . The choice of recording a personalized greeting or using one provided <
V> by Verizon <
E> . Messages can be up to 2 minutes each <
> . Notification of when you have a message waiting <
T> . The security of accessing your mailbox only with your personal <
E> passcode... wich you select. <
X> . The capability of receiving multiple messages at the same time <
T> (max. 5) <
> . No need for special equipment. The feature is simply added to your <
> existing service <
> <
```

OVZLOCAL\519 ... Press <Enter> to continue ...* (856) 985 - [REDACTED]
Question\NL_HVM
Page 3

[illegible]

OVZLOCAL\519 Question\RECAPLP (856) 985 -
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

```

T>
E> TAKE OPTION 1 IF CUSTOMER AGREES WITH SERVICE ADDED
X>
T>
>

```

```
> 1. YES, ACCEPTS Premium Local Package <
> 2. ** No, wants only individual products <
C> 3. ** Not a sale, customer changed his/her mind <
H> 4. ** No, just wants other services already selected <
Q>
I>
C>
E>
S>
>
>
>
>
```

OVZLOCAL\519 Question\RECAPHYM (856) 985 -
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

```
N> This plan will be effective starting on 06/28/2002 and the
A> monthly cost for this plan is $2.00 .
R>
R> There is no one-time charge for adding HVM to your account.
A>
T> I would also like to explain how your first bill with HVM will appear.
I> There will be 2 charges for HVM on your first bill. The first will
V> be the pro-rated portion that you will use between 06/28/2002 and
E> your next bill date.
> The second charge will be for one month in advance.
T>
X> Verizon bills monthly services one-month in advance. On your following
E> bill, you will only see HVM billed once.
T>
> Your mailbox will be set-up to hold 30 2-minute messages which can be
> stored for up to 30 days.
>
```

OVZLOCAL\519 Question\RECAPHVM2 (856) 985 - [REDACTED]
" " " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING " " "

```
> Finally, it is very important that you activate your Home Voice Mail <
> Service because no one will be able to leave you a message until you <
N> activate your service. Please take note of the following information <
A> so you won't miss any important calls. <
```

NJ_SCRIPT_LPP.txt

[illegible]

... Press <Enter> to continue ...*

```
OVSZLOCAL\519      Question\RECAPHVM3      (856) 985 - " " "  
" " " " " " " " " " " " " " " TRAINING <> TRAINING <> TRAINING  
> ** DO NOT READ **  
T>  
E> [REDACTED], last chance to decline/remove HOME VOICE MAIL  
X> from order.  
T>  
>  
-----  
> 1. Yes, add HVM  
> 2. No, do not add HVM  
C>  
H>  
O>  
I>  
C>  
E>  
S>  
>  
>  
>
```

S-Choice; : 1 :

OVSLOCAL\519 Question\SCLOSE (856) 985
TRAINING <> TRAINING <> TRAINING

> Mr./Ms. [REDACTED] we want you to know that we value you as
> a customer and we look forward to the opportunity to serve you in the
N> future.
A>
R> Is there anything else I can help you with today?
R> My goal today is to provide you with outstanding service.
A>
T> May I ask, have I done so? [REDACTED], IF CUSTOMER SAYS "NO":
I>
V> OVERCOME OBJECTIONS/ANSWER ALL QUESTIONS UNTIL CUSTOMER IS SATISFIED.
E> Great! If you have any questions regarding this call I can provide a
> toll free number for you, 800-755-1068.
T> Have a great day.
E>
X>
T>
>
> **====TURN OFF TAPE RECORDER!====**
>
> **DO NOT READ:**

====TURN OFF TAPE RECORDER!====

[REDACTED]